

EXHIBIT E

1 LABATON KELLER SUCHAROW LLP
2 Thomas A. Dubbs (*pro hac vice*)
3 Carol C. Villegas (*pro hac vice*)
4 Michael P. Canty (*pro hac vice*)
5 Thomas G. Hoffman, Jr. (*pro hac vice*)
6 140 Broadway
New York, NY 10005

5 *Lead Counsel to Securities Lead Plaintiff
and the Class*

6 MICHELSON LAW GROUP
7 Randy Michelson (SBN 114095)
8 220 Montgomery Street, Suite 2100
San Francisco, CA 94104

9 *Local Bankruptcy Counsel to
Securities Lead Plaintiff and the Class*

LOWENSTEIN SANDLER LLP
Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill (*pro hac vice*)
One Lowenstein Drive
Roseland, NJ 07068

Special Bankruptcy Counsel to
Securities Lead Plaintiff and the Class

Additional counsel listed on Exhibit A

11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14
15 In re:) Case No. 19-30088 (DM) (Lead Case)
16 PG&E CORPORATION)) Chapter 11
17 - and -)) (JOINTLY ADMINISTERED)
18 PACIFIC GAS AND ELECTRIC COMPANY,)) DECLARATION OF MID-JERSEY
19)) TRUCKING INDUSTRY & LOCAL 701
Debtors.)) PENSION FUND IN SUPPORT OF
19)) SECURITIES' PLAINTIFFS' MOTION FOR
20)) THE APPLICATION OF BANKRUPTCY
20)) RULE 7023 AND THE CERTIFICATION OF
21)) A CLASS OF SECURITIES CLAIMANTS
21
22 Affects Both Debtors
22
23 Affects PG&E Corporation
23
24 Affects Pacific Gas and Electric Company
25
26
27
28

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Giancarlo Prezioso, declare as follows:

2 1. I am the Administrative Manager for Named Plaintiff, Mid-Jersey Trucking
3 Industry & Teamsters Local 701 Pension & Annuity Fund (“Mid-Jersey Trucking”),¹ and I am
4 authorized to make this declaration. Mid-Jersey Trucking is a Taft-Hartley defined benefit plan
5 with approximately \$342 million in assets under management. I am the person at Mid-Jersey
6 Trucking who is primarily responsible for the administrative work related to this litigation on
7 behalf of Mid-Jersey Trucking.

8 2. Mid-Jersey Trucking’s transactions in PG&E’s securities during the Class Period,
9 and in PG&E bonds prior to the petition date in bankruptcy court, are identified in the attached
10 Exhibit 1 (“Ex. 1”). Ex. 1; *see also* Third Amended Consolidated Class Action Complaint for
11 Violation of the Federal Securities Laws (District Court ECF No. 121) (“Complaint”).

12 3. I, on behalf of Mid-Jersey Trucking, have regularly conferred with Robbins Geller
13 Rudman & Dowd LLP (“Robbins Geller” or “Securities Act Counsel”) concerning the litigation
14 and provided administrative assistance to Robbins Geller in prosecuting the case. For example, I
15 have received and reviewed documents filed with the Court including, but not limited to, the
16 Complaint, legal briefs related to Defendants’ motions to dismiss the Complaint in the District
17 Court, legal briefs related to Debtors’ objections to claims brought in bankruptcy court, and the
18 instant Motion to Certify Class, Appoint Class Representative and Appoint Class Counsel. I have
19 consulted with Robbins Geller concerning key events in the litigation, including document
20 collection and review and deposition scheduling.

21 4. Mid-Jersey Trucking is committed to continuing to actively direct this litigation
22 and maximize the recovery for the Class. As Named Plaintiff and proposed Class Representative,
23 Mid-Jersey Trucking understands that it owes fiduciary duties to all members of the Class to
24 provide fair and adequate representation and intends to continue to work with Securities Act
25 Counsel to obtain the maximum recovery possible for the entire Class consistent with good faith
26 and meritorious advocacy.

27
28 ¹ Formerly Mid-Jersey Trucking Industry & Local 701 Pension Fund.

1 5. Mid-Jersey Trucking also intends to continue to provide fair and adequate
2 representation by, among other things, further considering the advice and further directing the
3 efforts of Securities Act Counsel and proposed Class Counsel, Robbins Geller. Mid-Jersey
4 Trucking is aware that Robbins Geller has substantial experience and expertise in prosecuting
5 securities class actions and understands that Robbins Geller possesses the necessary financial and
6 human resources to prosecute the case effectively.

7 6. Mid-Jersey Trucking will not accept any payment for serving as Class
8 Representative beyond its pro rata share of any recovery, except for reimbursement of such
9 reasonable costs and expenses (including lost wages) directly relating to the representation of the
10 Class as ordered or approved by the Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th
day of December, 2024 in North Brunswick, NJ.

Giancarlo Preziosi

GIANCARLO PREZIOSO, ADMINISTRATIVE MANAGER

EXHIBIT A
COUNSEL

LABATON KELLER SUCHAROW LLP
Thomas A. Dubbs (*pro hac vice*)
Carol C. Villegas (*pro hac vice*)
Michael P. Canty (*pro hac vice*)
Thomas G. Hoffman, Jr. (*pro hac vice*)
140 Broadway
New York, NY 10005
Telephone: 212/907-0700
tdubbs@labaton.com
cvillegas@labaton.com
mcanty@labaton.com
thoffman@labaton.com

*Lead Counsel to Securities Lead Plaintiff
and the Class*

LOWENSTEIN SANDLER LLP
Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill (*pro hac vice*)
One Lowenstein Drive
Roseland, NJ 07068
Telephone: 973/597-2500
Facsimile: 973/597-2333
metkin@lowenstein.com
abehlmann@lowenstein.com
scargill@lowenstein.com

*Special Bankruptcy Counsel to
Securities Lead Plaintiff and the Class*

ROBBINS GELLER RUDMAN
& DOWD LLP
Darren J. Robbins (SBN 168593)
65 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
Facsimile: 619/231-7423
darrenr@rgrdlaw.com

VANOVERBEKE, MICHAUD &
TIMMONY, P.C.
Thomas C. Michaud
79 Alfred Street
Detroit, MI 48201
Telephone: 313/578-1200
tmichaud@ymlaw.com

Additional Counsel for Securities Act Plaintiffs

ADAMSKI, MORISKI, MADDEN,
CUMBERLAND & GREEN LLP
James M. Wagstaffe (SBN 95535)
100 Pine Street, Suite 2250
San Francisco, CA 94111
Telephone: 415/254-8615
wagstaffe@ammcglaw.com

*Liaison Counsel for Securities Lead Plaintiff
and the Class*

MICHELSON LAW GROUP
Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, CA 94104
Facsimile: 415/512-8601
randy.michelson@michelsonlawgroup.com

*Local Bankruptcy Counsel to
Securities Lead Plaintiff and the Class*

ROBBINS GELLER RUDMAN
& DOWD LLP
Willow E. Radcliffe (SBN 200089)
Kenneth J. Black (SBN 291871)
Hadiya K. Deshmukh (SBN 328118)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
Facsimile: 415/288-4534
willowr@rgrdlaw.com
kennyb@rgrdlaw.com
hdeshmukh@rgrdlaw.com

Counsel for Securities Act Plaintiffs

EXHIBIT 1

SCHEDULE A
SECURITIES TRANSACTIONS

Bond

<u>Date Acquired</u>	<u>Type of Debt</u>	<u>Face Amount</u>	<u>Price</u>
12/22/2017	3.3% due 03/15/2027	65,000	\$98.80
01/31/2018	4.0% due 12/01/2046	20,000	\$97.97
11/14/2018	4.75% due 02/15/2044	5,000	\$77.76
10/19/2015	6.05% due 03/01/2034	16,000	\$121.84
10/21/2015	6.05% due 03/01/2034	4,000	\$122.19
11/03/2015	6.05% due 03/01/2034	10,000	\$120.06
<u>Date Disposed</u>	<u>Type of Debt</u>	<u>Face Amount</u>	<u>Price</u>
01/14/2019	3.3% due 03/15/2027	65,000	\$78.00
01/14/2019	4.0% due 12/01/2046	20,000	\$75.75
01/14/2019	4.75% due 02/15/2044	5,000	\$76.57
03/10/2017	6.05% due 03/01/2034	5,000	\$123.44
01/29/2018	6.05% due 03/01/2034	15,000	\$123.00
01/31/2018	6.05% due 03/01/2034	10,000	\$122.65

Prices listed are rounded up to two decimal places.